

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 4:23CR00274 JMD/JSD
)	
MACE ANTHONY NOSOVITCH,)	
)	
Defendant.)	

**MOTION FOR LEAVE TO FILE THE UNITED STATES' RESPONSE TO
DEFENDANT'S POST-HEARING MEMORANDUM IN SUPPORT OF
MOTION TO SUPPRESS EVIDENCE (JAIL CALLS, ETC.)**

COMES NOW the United States of America, by and through its attorneys, Thomas C. Albus, United States Attorney for the Eastern District of Missouri, and Catherine M. Hoag, Assistant United States Attorney for said District, and hereby requests leave of this Honorable Court to file its Response in Opposition to Defendant's Post-Hearing Memorandum in Support of Motion to Suppress Evidence (Jail Calls, Etc.). In support, the United States informs the Court of the following:

1. The United States' Post-Hearing Response Brief was due on September 2, 2025.
2. Due to the Labor Day holiday weekend, counsel was unable to have its brief reviewed by a supervisor in time to file on September 2, 2025. Review was necessary due to the complex legal issues presented within the brief.
3. Opposing counsel was informed on September 2, 2025 of the Government's intention to file its Response on September 3, 2025.
4. This request is made in good faith.

WHEREFORE, the United States respectfully requests the Court grant the Motion for Leave to File its Response in Opposition to Defendant's Post-Hearing Memorandum in Support of Motion to Suppress Evidence (Jail Calls, Etc.).

Respectfully submitted,

THOMAS C. ALBUS
United States Attorney

/s/ Catherine M. Hoag
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CERTIFICATE OF SERVICE

I hereby certify that on September 3, 2025, the foregoing was filed electronically with the Clerk of the Court to be served electronically on all counsel of record.

/s/ Catherine M. Hoag
CATHERINE M. HOAG #67500MO
Assistant United States Attorney